

BURTON H. SILVERSTEIN, d/b/a
AAA ASSIGNMENT SERVICE, AS
ASSIGNEE OF DRS. JOHN E. FOSTER
AND JULIUS MICHAELSON, d/b/a
MEDICAL ARTS CENTER and
SOUTH BALDWIN HOSPITAL

Plaintiff

VS.

JO ANN WOODYARD

Defendant

IN THE CIRCUIT COURT OF

BALDWIN COUNTY, ALABAMA

AT LAW

CASE NO. 8569

1.

The Plaintiff claims of the Defendant, JoAnn Woodyard, the sum of FOUR HUNDRED EIGHTY FOUR and 25/100 DOLLARS (\$484.25) due on a promissory note drawn by her on the 31st day of January, 1966 for the payment of FOUR HUNDRED EIGHTY FOUR AND 25/100 DOLLARS to the South Baldwin Hospital, by whom the said promissory note was indorsed to the Plaintiff and the said promissory note, not being paid at maturity was duly protested of which the Defendant had due notice. The said promissory note, with interest thereon, is still unpaid. The Plaintiff avers that the Defendant agreed in the promissory note to pay all expenses including reasonable attorney's fees in collecting same and the Plaintiff claims a reasonable attorney's fee in the amount of \$75.00. The Plaintiff avers that the Defendant waived all right of exemption under the laws of the State of Alabama as to personal property.

2.

The Plaintiff claims of the Defendant the sum of TWO HUNDRED FORTY AND NO/100 DOLLARS (\$240.00) balance due after all proper credits given on a promissory note made by the Defendant on the 20th day of May, 1968 and payable as follows: \$5.00 on the 24th of each month, the first payment due May 24, 1968. The Plaintiff avers that the Defendant defaulted in the payments and under the provisions of the note sued on, the whole balance became due and payable. The Plaintiff avers that the Defendant agreed in the promissory note to pay all expenses including reasonable attorney's fees

incurred in the collecting same and the Plaintiff claims a reasonable attorneys fee in the amount of \$35.00. The Plaintiff further avers that the Defendant waived all right of exemption under the laws of the State of Alabama as to personal property.

WILTERS, BRANTLEY & NESBIT

BY:

Phyllis S. Nesbit
Attorney for Plaintiff

FILED

FEB 12 1969

ALICE J. DUEK

CLERK
REGISTER

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No.

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon JoAnn Woodyard

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

JoAnn Woodyard, Defendant.....

by Burton H. Silverstein, d/b/a AAA Assignment Service

Plaintiff.....

Witness my hand this 12 day of Feb 19 69

[Signature], Clerk

2/26/69

No. 8569

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

Burton H. Silverstein, d/b/a

AAA Assignment Service
Plaintiffs

vs.

JoAnn Woodyard

Defendants

SUMMONS AND COMPLAINT

FILED

Filed 19.....

FEB 12 1969

Clerk

ALICE J. DUCK

CLERK
REGISTER

WILTERS, BRANTLEY & NESBIT

BY:

Plaintiff's Attorney

Defendant's Attorney

Defendant lives at

1705 S. Cedar Street
Foley, Alabama

Received in Office

FEB 12 1969 19.....

JOHN WILKINS
SHERIFF

Sheriff

I have executed this summons

this Feb 26 1969

by leaving a copy with

JoAnn Woodyard

Sheriff claims 72 miles at

Ten Cents per mile Total \$ 7.20

TAYLOR WILKINS, Sheriff

BY: Carol L. Chiles
DEPUTY SHERIFF

John Wilkins Sheriff

Carol L. Chiles Deputy Sheriff

Foley